

K&L GATES

MEMO ENDORSED

The application is X granted
 denied



Edgardo Ramos, U.S.D.J.

Dated: October 22, 2021

New York, New York 10007

October 22, 2021

By ECF

The Honorable Edgardo Ramos
United States District Court for the Southern
District of New York
40 Foley Square
New York, NY 10007

Re: *Bodum Holding AG et al. v. Starbucks Corporation*, Case No. 1:19-cv-04280-ER

Dear Judge Ramos:

We represent Defendant Starbucks Corporation (“Starbucks” or “Defendant”) in the referenced action and write jointly on behalf of the parties. At the October 8, 2021 conference, the Court inquired as to the current status of discovery. The parties informed the Court that depositions had been stayed since March pursuant to the Court’s order, and that the parties had several outstanding discovery disputes that needed to be resolved (either through meet and confers or through further motion practice) in order to be able to accurately determine how long additional document productions would take in advance of depositions resuming. The Court asked the parties to continue their efforts to resolve the outstanding discovery disputes and to advise the Court by October 22, 2021 of the status of those disputes and, if possible, submit a proposed schedule to the Court for Your Honor’s review.

Despite the parties’ best efforts, they have not yet been able to reach agreement on all of their outstanding discovery disputes and are therefore not able to submit a proposed case schedule at this time. However, the parties have made significant progress and have narrowed the scope of their disputes. The parties respectfully request a two-week extension of the October 22 deadline so that they can continue to meet and confer in good faith in the hopes of reaching agreement and presenting a stipulated case schedule to the Court. If the parties are unable to reach agreement, they will submit on November 5, 2021 a proposed schedule for presenting the outstanding discovery disputes to the Court. This is the parties’ first request for an extension of the October 22 deadline.

Respectfully submitted,

/s/ Joanna A. Diakos

Joanna A Diakos